



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 23 2011

REPLY TO THE ATTENTION OF:
WC-15J

CERTIFIED MAIL 7001 0320 0006 0196 8780
RETURN RECEIPT REQUESTED

IEPA - DIVISION OF RECORDS MANAGEMENT
RELEASABLE

MAR 29 2019

REVIEWER: JMR

Dennis Traiteur
Manager, Commonfields of Cahokia Public Water District
2525 Mausette Lane
East St. Louis, IL 62206

Subject: Wet Weather/Sanitary Sewer System Review of Commonfields of Cahokia
Public Water District, East St. Louis, IL; Information Request Pursuant to 33
U.S.C. § 1318 of the Clean Water Act, Docket No. V-W-11-308- 17

Dear Mr. Traiteur:

Protecting water quality is a high priority of the U.S. Environmental Protection Agency. Pollutants discharged to waterways from sewer overflows contribute to poor water quality and impairment of the beneficial uses of those waterways.

As authorized by the Clean Water Act (CWA or the "Act"), the National Pollutant Discharge Elimination System (NPDES) permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States (U.S.). As you know, the Illinois Environmental Protection Agency (IEPA) issued permit number IL0065145 to the American Bottoms Regional Wastewater Treatment Authority. The Commonfields of Cahokia Public Water District is a tributary contributor of sewerage which is transported to this authority's wastewater treatment plant. The permit authorizes discharge to waters of the U.S., in accordance with effluent limitations, monitoring requirements, and other conditions set forth in the permit. This request seeks information related to the operation and maintenance of the Commonfields of Cahokia Public Water District's system, including whether and when any overflows may have left the collection system before receiving required treatment.

EPA is authorized under section 308 of the CWA, 33 U.S.C. § 1318, to require reports and other information necessary to carry out the purpose of the Act. Accordingly, pursuant to section 308 of the Act, you are directed to provide EPA with the information requested in the enclosure.

Please submit the information requested in the accompanying documents with a statement certifying that all representations contained therein are true and accurate to the best of your knowledge and belief using the certification language provided in the enclosure. Please exercise care to assure that responses are complete and accurate, because section 309(c)(2) of the Act, 33 U.S.C. § 1319(c)(2), provides for the imposition of criminal penalties where false information is knowingly provided to EPA.

Please respond in writing with the information requested in the enclosure, within thirty (30) days of receipt of this letter with copies to:

Water Enforcement and Compliance Branch
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd. (WC-15J)
Chicago, IL 60604 -3590
Attention: John Wiemhoff

If you have any questions which come up during the completion of this information request, please feel free to contact John Wiemhoff at 312-353-8546, or via email at wiemhoff.john@epa.gov with your questions. Thank you for your timely response to this information request.

Sincerely,



Tinka G. Hyde
Director, Water Division

Enclosure

cc: Bruce Yurdin, IEPA

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Commonfields of Cahokia
Public Water District**

) Docket No. V-W-11-308-17
)
) Proceeding under
) section 308(a) of the
) Clean Water Act (CWA), as
) amended,
) 33 U.S.C. § 1318(a)

STATUTORY AUTHORITY

The following request is made pursuant to the authority vested in the Administrator of the U.S. Environmental Protection Agency by the above referenced statute and duly re-delegated to the undersigned Director of the Water Division, EPA Region 5. There can be significant civil or criminal penalties for failing to adequately respond to requests for information issued under the Clean Water Act (CWA) section 308(a), 33 U.S.C. § 1318(a).

DEFINITIONS

1. "Bypass," as that term is defined by 40 C.F.R. § 122.41(m), means the intentional diversion of waste streams from any portion of a treatment facility.
2. "Collection System" shall mean all portions of the Commonfields of Cahokia Public Water District's sewer system which collect and convey sanitary and or combined sewage for treatment to the regional wastewater treatment plant. The collection system, for purposes of this information request, does not refer to the separate storm sewer system.
3. "Combined Sewer" shall mean a sewer designed and constructed to receive both wastewater and land runoff (Illinois Administrative Code section 301.255; Source: Amended at 3 Ill. Reg. no. 25, page 190, effective June 21, 1979.)
4. "Day" or "days" shall mean a calendar day or calendar days. In computing any period of time under this request, where the last day would fall on a Saturday, Sunday, or federal or state holiday, the period shall run until the close of the next business day.
5. "Force Main" shall mean any pipe that receives or conveys, under pressure, wastewater from the discharge side of a pump. A Force Main is intended to convey wastewater under pressure.
6. "Gravity Sewer" shall mean a pipe that receives, contains, and conveys wastewater not normally under pressure, but is intended to flow unassisted under the influence of gravity.

7. "Infiltration," as defined by 40 C.F.R. § 35.2005(b)(20), shall mean water other than wastewater that enters a sewer system (including sewer service connections and foundation drains) from the ground through such means as defective pipes, pipe joints, connections, or manholes.
8. "Inflow," as defined by 40 C.F.R. § 35.2005(b)(21), shall mean water other than wastewater that enters a sewer system (including sewer service connections) from sources such as, but not limited to, roof leaders, cellar drains, yard drains, area drains, drains from springs and swampy areas, manhole covers, cross connections between storm sewers and sanitary sewers, catch basins, cooling towers, storm water, surface runoff, street wash waters, or drainage.
9. "I/T" shall mean the total quantity of water from Infiltration and Inflow without distinguishing the source.
10. "Pollutant" shall be defined as that term as defined in section 502(6) of the CWA, 33 U.S.C. § 1362(6).
11. "Private Lateral" shall mean that portion of the Sanitary Sewer System(s), not owned by the Commonfields of Cahokia Public Water District, used to convey wastewater from a building or buildings to that portion of the Sanitary Sewer System owned by the Commonfields of Cahokia Public Water District.
12. "Pump Station" shall mean facilities comprised of pumps or other equipment which lift wastewater to a higher hydraulic elevation, including all related electrical, mechanical, and structural systems necessary to the operation of that pumping station.
13. "Record" or "records" is defined for purposes of this request as any recording of information in tangible form. It includes, but is not limited to, documents, memoranda, reports, letters, maps, graphs, charts, log books, notes, emails, computer files, computer printouts, and computer databases.
14. "Sanitary Sewer" shall mean a conduit intended to carry liquid and water-carried wastes from residences, commercial buildings, industrial plants and institutions together with minor quantities of ground, storm and surface waters that are not admitted intentionally (40 CFR §35.2005 (b)(37)).
15. "Sanitary Sewer Overflow" or "SSO" shall mean an overflow, spill, diversion, or release of wastewater from or caused by the Sanitary Sewer System(s) tributary to the Commonfields of Cahokia Public Water District's wastewater treatment plant. This term shall include: (i) discharges to waters of the State or United States from the Sanitary Sewer System(s); and (ii) any release of wastewater from the Sanitary Sewer System(s) to public or private property that does not reach waters of the United States or the State, including building/property backups.

16. "Sanitary Sewer System(s)" shall mean all portions of the Commonfields of Cahokia Public Water District's sewer system (including all pipes, force mains, gravity sewer segments, overflow structures, regulators, pump stations, manholes, and components thereof), designed and constructed to collect and convey only sewage, and not storm water, from residences, commercial buildings, industrial plants, and institutions for treatment at the Commonfields of Cahokia Public Water District wastewater treatment plant.
17. "Satellite Sewer System" shall mean a sewer collection system from one legal entity, which collect wastewaters and deliver these wastewaters from their community, and delivers these wastewaters into a receiving sewer or interceptor of a downstream different legal entity or community. The satellite sewer system typically depends on a downstream authority for the treatment of these transferred wastewaters.
18. "Wastewater Treatment Plant(s)" or "WWTP(s)" shall mean the regional wastewater treatment plant(s) operated by the American Bottoms Regional Wastewater Treatment Plant (NPDES Permit # IL0065145), and located at 1 American Bottoms Road, Sauget, IL 62201 and all components of such sewage treatment plant(s).
19. "You" for purposes of this request refers to the Commonfields of Cahokia Public Water District and to any agents, employees, contractors, or other entities that performed work or acted in any way on behalf of, or at the direction of the Commonfields of Cahokia Public Water District.

INSTRUCTIONS

- A. You must respond to this request for information within 30 calendar days from receipt of this request.
- B. You must respond separately to each of the questions or requests. Where a "yes" or "no" answer is requested, you can provide additional information, if desired. If the requested information requires a lengthy narrative response, precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question or request to which it responds.
- C. If the Commonfields of Cahokia Public Water District does not have documents responsive to a particular question or request, state in the written response that the Commonfields of Cahokia Public Water District does not have such documents.
- D. The Commonfields of Cahokia Public Water District shall maintain the reports and all records reviewed or generated in the course of responding to this Information Request

until EPA informs the Commonfields of Cahokia Public Water District in writing that maintenance of such records is no longer required.

REQUEST FOR INFORMATION

1. Provide the name and address of the location(s) where records relative to the operation and maintenance (O&M) of the sanitary sewer systems are maintained.
2. Provide the latest NPDES permit, including modifications, issued to the Commonfields of Cahokia Public Water District for its WWTP/sewer system.
3. Provide the name of the primary contact person responsible for sanitary sewer system maintenance. Also include telephone, fax and email contact information.
4. Provide requested sanitary sewer system data as indicated below:

A. Service Area _____ (in square miles)

B. Population Served _____

C. System Inventory

Miles of Gravity Sewer	Miles of Force Main	Number of maintenance access structures	Number of Pump Stations	Number of siphons	Number of air, vacuum, or air/vacuum relief valves

D. Number of Service Connections:

Residential _____ Commercial _____
Industrial _____ Total _____

E. Indicate or describe a property owner's responsibility for maintenance and repair of private laterals (check one):

1. At main line connection only _____
2. From main line to property line or easement/cleanout _____
3. Beyond property line/cleanout _____
4. Other _____ Explain.

F. Is the collection system(s) combined (storm and sanitary)?

Yes _____ No _____

If yes, what percent of the collection system is a combined system? _____

- G. Does the collection system have constructed relief points?
Yes_____ No_____

If yes, describe the locations of the relief points in the system. Indicate if such relief points are in the separate sanitary portion of the system or in a combined area and identify the water body or location where these relief points discharge.

- H. Provide the following precipitation data for the service area of the WWTP.

	Rainfall (inches/month)					
	2006	2007	2008	2009	2010	2011
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
Annual Total						

- I. Provide design flow ratings for the WWTP in millions of gallons per day (MGD)

Design Average Daily Flow * (MGD)	Design Peak Dry Weather Flow (MGD)	Design Peak Wet Weather Flow * (MGD)

* as listed in NPDES Permit, if applicable

Discuss any processes or operations that can limit the treatment capacity or efficiency at the WWTP (i.e., pump capacity, flow restrictions, tank size, etc.)

J. Provide current actual flows or ratings experienced, in MGD

	Average Daily Flow (MGD)	Average Daily Water Consumption (MGD)
Residential		
Commercial		
Industrial		
Other		
Total		

	Per Capita Wastewater Flow (MGD)	Per Capita Water Consumption Flow (MGD)
Maximum Month		
Maximum Week		
Maximum Day		

K. Provide infrastructure age distribution estimates for the collection system

Age	Gravity Sewer, miles	Force Mains, miles or feet	Number of Pump Stations
0 - 25 years			
26 - 50 years			
51 - 75 years			
> 76 years			

L. Provide collection system pipe size distribution estimates for the collection system

Diameter in inches	Gravity Sewer, miles	Force Mains, miles or feet
8 inches or less		
9 - 18 inches		
19 - 36 inches		
> 36 inches		

5. Does the collection system receive flow from upstream satellite sewer system communities?
Yes _____ No _____

If yes, complete the following chart. If no, please proceed to question 7 below.

Satellite Community Name (If additional room is needed, continue on last page.)	% flow contributed

6. Do satellite sewer system communities enter into written agreements for wastewater services (contracts, charters, court orders, etc.) with the Commonfields of Cahokia Public Water District?

Yes _____ No _____; Please describe:

If "Yes", please answer A-G below:

- A. Do the agreements extend the requirements of the sewer use ordinance (SUO) to the satellite communities? Yes _____ No _____
- B. Do the agreements have a date of termination? Yes _____ No _____
If so, under what conditions are such agreements renewed? _____
- C. Does the Commonfields of Cahokia Public Water District maintain the legal authority to control the maximum flow introduced into the collection system from satellite communities? Yes _____ No _____
- D. Is flow metered at locations where flow from the satellite communities directly enters the Commonfields of Cahokia Public Water District's sanitary sewer system? Yes _____ No _____
- E. Does the Commonfields of Cahokia Public Water District have the authority to surcharge satellite communities for excessive flows (e.g., for excessive inflow and infiltration (I/I))?
Yes _____ No _____
- F. Has the Commonfields of Cahokia Public Water District exercised its authority to surcharge satellites for excessive flows (e.g., for excessive I/I)? Yes _____ No _____
If yes, identify the satellite communities in which this action was taken, and describe the action taken:

G. Please explain why, or why not, authority was exercised:

7. Describe the process or procedures that are used in determining whether the capacity of existing gravity sewer system, pump stations, and force mains are adequate for new connections.
- A. Is flow metering performed to verify if there is sufficient capacity in the downstream sewer system, prior to allowing new connections? Yes____ No____
 - B. Is a hydraulic model of the system used to predict the effects of new connections? Yes____ No____
 - C. Is there any written certification that is required indicating that the sanitary sewer system has been determined to have adequate capacity to accommodate flow from new connections? Yes____ No____
 - D. Does the sewer use ordinance (SUO) clearly include standards, inspections, and approval for new connections? Yes____ No____
 - E. Does the SUO require satellite communities to adopt the same standards, inspection and sampling schedules as required for new connections that are done within the Commonfields of Cahokia Public Water District? Yes____ No____
 - F. Does the SUO require satellite communities to adopt the same standards, inspection and sampling schedules as required for pretreatment inspections within the Commonfields of Cahokia Public Water District? Yes ____ No ____
8. Does the SUO contain procedures for the following:
- A. Inspection standards? Yes ____ No____
 - B. Pretreatment requirements? Yes ____ No____
 - C. Building/sewer permit issues? Yes ____ No____
 - D. Inflow prohibition? Yes ____ No____
9. Does the SUO contain procedures and enforcement authority to control the following:
- A. Fats, oils, and grease? Yes ____ No ____
 - B. I/I? Yes ____ No ____
 - C. Building structures over the sewer lines? Yes ____ No ____
 - D. Storm water connections to sanitary lines? Yes ____ No ____
 - E. Defects in service laterals located on private property? Yes ____ No ____
 - F. Sump pump or air conditioner discharge? Yes ____ No ____

10. Describe any local conditions that have increased or may increase the complexity or difficulty of the design, construction, operation, or maintenance of the collection system. Provide a brief explanation of the local conditions and measures utilized to compensate for the condition such as:

A. Weather (ex. precipitation, temperature);

B. Terrain/Geology/Soils;

C. Groundwater or surface body influence; or

D. Other; Explain: _____

11.A. Provide information for the following events for the last 5 years, including dates of occurrence:

1. Wastewater treatment plant (WWTP) effluent limit exceedances: _____

2. Flows from the sewer collection system which did not ultimately receive full secondary treatment at the WWTP: _____

3. Treatment upsets at the WWTP due to wet weather flow: _____

11.B. If Item 11.A.2 above includes listed events of wastewaters not receiving full secondary treatment, please indicate for each event, whether the discharge condition is authorized under your NPDES permit. If so, what permit provision number, including page number of the permit, authorizes such discharge, respectively.

12. Has the system experienced corrosion problems in the last 5 years? Yes _____ No _____
If yes, describe the location and extent that corrosion in the collection system is a maintenance problem.

13. Is there a corrosion control program in place? Yes _____ No _____
If yes, what has been the preferred treatment or prevention program selected or implemented? _____

14. Is there an odor control program in place? Yes _____ No _____
If yes, describe the extent of any odor control issues and identify the locations where odor complaints originate.
-
15. Is there a grease control program in place? Yes _____ No _____
If yes, describe the program and the extent that grease blockages in the collection system are a problem and identify the locations where chronic grease blockages occur.
-
16. What tools are used to address grease problems, for example: grease trap ordinances and inspections, physical removal of grease, and chemical additions to dislodge or dissolve grease? _____
-
17. Is there a root control program in place? Yes _____ No _____;
If yes, describe the program and the extent that root blockages in the collection system are a problem and identify the locations where chronic root blockages occur.
-
18. Is there a procedure to ensure the required reporting of any sanitary system overflows (SSOs) to the State Environmental agency (24 hr call and 5 day written report)? _____
19. Discharges from the Sanitary System:
- A. Sanitary System Overflow (SSO) Events: Provide a description of SSOs, partially treated sanitary sewage discharges, or untreated sanitary sewage discharges that have occurred in the collection system within the last five years. Include the following information for each incident (create a supplemental table as necessary to list the data below):
- i. Date;
 - ii. Location;
 - iii. Estimated volume of the SSO;
 - iv. Cause of the SSO;
 - v. Depth of precipitation (in inches) received (if any) contributing to the SSO;
 - vi. Peak WWTP flow (in MGD) on the day that the SSO occurred;
 - vii. Disposition of the SSO (did the release reach a waterway, flow to storm sewer, paved areas, basements etc);
 - viii. Actions taken to mitigate the SSO; and
 - ix. Whether or not the event was reported to the State Environmental Agency and how soon after the event occurred was this done.

B. NPDES Permitted Discharges: Provide a description of treated or untreated sewer discharges which are authorized by your NPDES permit which did not receive full secondary treatment at the main downstream WWTP and have occurred in the collection system within the last five years. Include the following information for each discharge (create a supplemental table as necessary to list the data below):

- i. Date;
- ii. Location;
- iii. Estimated volume of discharge
- iv. If discharged through a permitted remote sanitary sewer treatment facility, list NPDES permit provision number and page number in permit: _____
- v. If discharged through a permitted remote sanitary sewer treatment facility, were all permit conditions and limitations met? Yes___ No___
If no, describe: _____

20. For the SSOs discharged to waterways that are identified in response to the question # 19 above, how many were to surface waters that could affect:

- A. Primary contact recreation (swimming, bathing, waterskiing, etc.)? ____
- B. Shellfish growing areas? ____
- C. Drinking water sources? ____

21. Approximately, how many of the SSOs were from:

- A. Manholes? ____
- B. Pump stations? ____
- C. Main and trunk sewers? ____
- D. Lateral and branch sewers? ____
- E. Structural bypasses or relief points? ____

22. Approximately, how many of the SSOs were caused by the following:

- A. Debris buildup? ____
- B. Collapsed pipe? ____
- C. Root intrusion? ____
- D. Capacity limitations? ____
- E. Excessive I/I? ____
- F. Fat/Oil/Grease? ____
- G. Vandalism? ____
- H. Power interruption and/or lack of backup power source? ____
- I. Mechanical or electronic failure? ____
- J. Pump failure and/or lack of backup (or Duplex) pumps? ____

23. What equipment is available for responding to SSOs?

24. Has the Commonfields of Cahokia Public Water District developed and adopted written procedures or instructions for the following:

- A. SSOs? Yes _____ No _____
- B. Reporting all SSOs to the state regardless of size? Yes _____ No _____
- C. Containment or cleanup to mitigate the effect of SSOs? Yes _____ No _____
- D. Problem evaluation and solutions? Yes _____ No _____

25. Are locations where multiple SSOs have occurred posted with warning signs?

Yes _____ No _____

If yes, describe _____

26. Are there portions of the collection system service areas that have experienced:

- A. Basement flooding, with sewage as a component? Yes _____ No _____
If yes, describe: _____
- B. Street flooding, with sewage as a component? Yes _____ No _____
If yes, describe: _____

27. Provide the following information related to SSOs that have occurred during dry weather:

- A. Annual number of stoppages: _____
- B. Average time to clear a stoppage: _____ minutes
- C. Annual number of stoppages resulting in overflows and/or back-ups: _____
- D. Total annual volume of overflows or releases: _____

28. Provide the following information related to pump and lift station design:

- A. Total number of pump or lift stations in the collection system: _____
- B. Number of pump or lift stations with on-site pump capacity redundancy: _____
- C. Number of pump stations with dry weather capacity limitations: _____
- D. Number of pump stations with wet weather capacity limitations: _____
- E. Number of pump or lift station failures resulting in overflows/releases, or backups, in the last five years: _____
- F. Number of pump stations fed with electrical power from at least 2 independent electrical power grid feeds: _____
- G. Number of pump stations with permanently installed backup power generator on-site with automatic activation when supplied power is interrupted: _____
- H. Number of pump stations with backup power capability, but only with the use of portable generator to be brought to the pump station site from other location (e.g., with proper power coupler installed on generator): _____
- I. Number of pump stations with "pump around" capability (e.g., where pump station wet well can be evacuated and pumped with portable pump to nearby downstream sanitary sewer system manhole): _____
- J. Number of pump stations where conditions of the pump station are monitored including alarm triggered (via wired or wireless) back at central monitored point (wastewater treatment plant or central public works center): _____

29. How many miles or feet of force main are monitored annually? _____

30. Provide the techniques/approaches used to monitor the force main: _____

31. Provide the number of force main failures in the last 5 years: _____

32. Provide a description of the cause(s) of each force main failure in the last 5 years: _____

33. Provide the quantity of SSOs, discharges, releases or bypasses expressed in gallons or MG from each of the following for the last 5 years:

- A. Pump Stations: _____
- B. Force Mains: _____
- C. Sanitary sewer manholes: _____
- D. Other (_____): _____
- E. Other (_____): _____

34. For each SSO, is a failure mode and effects analysis (FMEA) or other similar rigorous diagnosis completed? Yes _____ No _____

35. Are future preventive measures initiated based on each FMEA? Yes _____ No _____

If yes, explain: _____

36. Provide the following information related to service to wastewater system users and customers:

- A. Average annual user charge rate per residential household: \$ ____/year;
- B. Is the residential rate based on water consumption or a flat rate? _____
- C. Number of user complaints received annually during the last 5 years: _____
- D. A description of the complaints delineated in a table identifying those complaints which have been determined to be the responsibility of the Commonfields of Cahokia Public Water District as opposed to those complaints which have been the responsibility of others (personal property) for the last five years.
- E. Number of public health or other warnings attributed to wastewater issued by the Commonfields of Cahokia Public Water District annually: _____
- F. Number of claims for damages due to backups annually for the last 5 years: _____
- G. Provide the total cost of claims against the Commonfields of Cahokia Public Water District related to wastewater management settled annually for the last 5 years: \$ _____
- H. When was the last wastewater related rate increase? _____(mo/yr)

37. Provide the following information related to financial management of wastewater service:

- A. Total annual revenue received from wastewater user charges:
- i. Percent of revenue for long-term debt: ____%
 - ii. Percent of revenue for treatment and disposal: ____%
 - iii. Percent of revenue for collection and conveyance: ____%
- B. Other sources of revenue (i.e., property tax, tap-in fees, etc):
- i. Percent of revenue for long-term debt: ____%
 - ii. Percent of revenue for treatment and disposal: ____%
 - iii. Percent of revenue for collection and conveyance: ____%
- C. Provide the annual O&M budget for the wastewater collection and conveyance system: \$____K.
- D. Provide the annual costs of O&M for the wastewater collection and conveyance system for the most recent service year: \$____K.
- E. Provide the annual O&M budget for the wastewater treatment system: \$____K.
- F. Provide the annual costs of O&M for the wastewater treatment system for the most recent service year: \$____K.
- G. Does the Commonfields of Cahokia Public Water District have a long-range wastewater Capital Improvement Project (CIP) Plan for sewer system rehabilitation, replacement, and expansion?
Yes ____ No ____
- H. If yes to G. above, over what time horizon (5 years; 10 years; etc.): ____ years

38. Provide the following information for I/I in the sanitary sewer system:

- A. Have any assessments been done to determine the extent of I/I? Yes ____ No ____
- B. Has it been demonstrated that it is more cost effective to eliminate rather than treat I/I? Yes ____ No ____
- C. Has a sewer system evaluation study (SSES) been performed, (as defined in U.S. EPA, Guidance For Sewer System Evaluation; March 1974)?
Yes ____ No ____
If yes, when? ____ (mo/yr)

- D. Have rehabilitation projects been prioritized for correcting I/I problems?
Yes _____ No _____
If yes, how far has the I/I elimination program progressed?

- E. Does the Commonfields of Cahokia Public Water District, or any of its satellite communities, have a private source I/I reduction program? Yes _____ No _____
Please describe. _____
39. Does the Commonfields of Cahokia Public Water District televise its sewers to evaluate the condition of the collection system? Yes _____ No _____
If yes, what percent of the total sanitary sewer system is televised on an annual basis? ____%
40. When televising sewers, are adjacent storm swales flooded to simulate rainfall? Yes___ No__
41. List the frequency of cleaning sewers and manhole basins for the following:
Largest sewers: every _____ months (e.g., every 36 months)
Smaller sewers: every _____ months
42. Does the Commonfields of Cahokia Public Water District conduct internal smoke testing for evaluating the condition of the collection system? Yes _____ No _____
Is yes, when was the last series of smoke testing done, and in what area and for what reason?

43. Does the Commonfields of Cahokia Public Water District physically inspect all sanitary system manholes at a defined frequency? Yes_____ No_____
If yes, what is the frequency? Every __ months (e.g., every 36 months)
44. Does the sanitary sewer system experience chronic O&M problems that are attributed to design problems? Yes _____ No _____
If yes, provide brief explanation. _____
45. Does the sanitary sewer system experience chronic O&M problems that are the result of construction issues in the system? Yes _____ No _____
If yes, provide brief explanation. _____
46. Does the WWTP operate an industrial pretreatment program? Yes _____ No _____

Please submit your responses to this request within the designated time frame to:

Water Enforcement & Compliance Assurance Branch (WC-15J)
U.S. EPA Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3590
Attention: John Wiemhoff, Environmental Engineer

You may consider confidential the information that you submit to us. You may assert a claim of business confidentiality for any portion of the submitted information. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B. Under 40 C.F.R. § 122.7, the entitlement does not apply to information in permit application forms, and claims of confidentiality for the following will be denied: name and address of any permit applicant or permittee, permit applications, permits, and effluent data. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice.

In submitting the information required in this request, the Commonfields of Cahokia Public Water District shall provide the following certification signed by either a principal executive officer or ranking elected official:

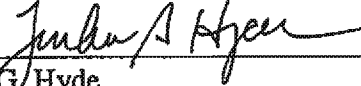
I certify under penalty of law that this response and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If at any time after submitting the requested information the signatory determines that any portion of such statement(s) certified as true is false or incorrect, the signatory must notify EPA. Knowingly providing false information, in response to this request, may be actionable under section 309(c)(4) of the Act, 33 U.S.C. § 1319, and 18 U.S.C. §§ 1001 and 1341.

EPA may use the information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Please contact John Wiemhoff of my staff at (312) 353-8546, or via email at Wiemhoff.john@epa.gov, if you have any questions about this request. Neither the issuance of this request by EPA nor compliance with this request by you, relieves you of liability for any penalty, fine, remedy, or sanction authorized to be imposed pursuant to sections 309(b), (c), (d), and/or (g) of the Act, 33 U.S.C. § 1319(b), (c), (d), and/or (g), including but not limited to any violations addressed by this request. EPA specifically reserves the right to seek any or all of the remedies specified in sections 309(b), (c), (d), and/or (g) of the Act, 33 U.S.C. § 1319(b), (c), (d), and/or (g).



Tinka G Hyde
Director, Water Division
U.S. Environmental Protection Agency, Region 5

Date 2/23/11

Attachment

AUTHORITY AND CONFIDENTIALITY PROVISIONS

Authority

Information requests are made under authority provided by Section 308 of the Clean Water Act, 33 U.S.C. 1318. Section 308 provides that: "Whenever required to carry out the objective of this Act, ...the Administrator shall require the owner or operator of any point sources to (i) establish and maintain such records, (ii) make such reports, (iii) install, use and maintain such monitoring equipment and methods (including where appropriate, biological monitoring methods), (iv) sample such effluent... and (v) provide such other information as he may reasonably require; and the Administrator or his authorized representative, upon presentation of his credentials, shall have a right of entry to...any premises in which an effluent source is located or in which any records...are located, and may at reasonable times have access to and copy any records...and sample any effluents..."

Please be advised that the submission of false statements is subject to federal prosecution under 18 U.S.C. §1001 and that this or any other failure to comply with the requirements of Section 308 as requested by U.S. EPA may result in enforcement action under the authority of Section 309 of the Clean Water Act, which provides for specified civil and/or criminal penalties.

Confidentiality

U.S. EPA regulations concerning confidentiality and treatment of business information are contained in 40 CFR Part 2, Subpart B. Information may not be withheld from the Administrator or his authorized representative because it is viewed as confidential. However, when requested to do so, the Administrator is required to consider information to be confidential and to treat it accordingly, if disclosure would divulge methods or processes entitled to protection as trade secrets (33 U.S.C. §1318(b) and 18 U.S.C. §1905), except that effluent data (as defined in 40 CFR §2.302(a)(2)) may not be considered by U.S. EPA as confidential.

The regulations provide that one may assert a business confidentiality claim covering part or all of any trade secret information furnished to U.S. EPA at the time such information is provided to the Agency. The manner of asserting such claims is specified in 40 CFR §2.203(b). In the event that a request is made for release of information covered by such claim of confidentiality or the Agency otherwise decides to make determination as to whether or not such information is entitled to such confidential treatment, notice will be provided to the claimant prior to any release of the information. However, if no claim of confidentiality is made when information is furnished to U.S. EPA, any information submitted to the Agency may be made available to the public without prior notice.

Note:

This information request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501 et seq.